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In Propria Persona

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF CALIFORNIA

WESTERN DIVISION

TODD R. G. HILL, et al,

Plaintiffs

vs.

THE BOARD OF DIRECTORS, OFFICERS AND AGENTS AND INDIVIDUALS OF THE PEOPLES COLLEGE OF LAW, et al.,

Defendants.

CIVIL ACTION NO. 2:23-cv-01298-CV-BFM

The Hon. Cynthia Valenzuela
Courtroom 5D, 5th Floor

Magistrate Judge Brianna Fuller Mircheff
Courtroom 780, 7th Floor

PLAINTIFF'S NOTICE OF NON-ENGAGEMENT REGARDING CASE MANAGEMENT COORDINATION; AFFIDAVIT OF TODD R.G. HILL IN SUPPORT

NO ORAL ARGUMENT REQUESTED

CONTENTS

Cases

Rules

PLAINTIFF'S NOTICE OF NON-ENGAGEMENT REGARDING CASE MANAGEMENT COORDINATION

TO THE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:

Plaintiff Todd R. G. Hill submits this Notice of Non-Engagement, documenting the continued failure of Defendant Ira Spiro and other defense parties to engage in the required Rule 26(f) and Local Rule 16-2 pretrial coordination efforts in good faith.

I. INTRODUCTION: THE DEFENDANTS' COORDINATED OBSTRUCTION OF PROCEDURAL OBLIGATIONS

Federal Rule of Civil Procedure 26(f) and Local Rule 16-2 mandate pretrial coordination in good faith to ensure the efficient management of litigation. Despite clear obligations under these rules, Defendant Ira Spiro, along with Haight Brown & Bonesteel LLP and the State Bar Defendants, have deliberately refused to substantively engage in case management coordination. The pattern of conduct demonstrates an ongoing effort to evade accountability, obstruct procedural obligations, and delay meaningful resolution of critical case management issues.

The April 29, 2022, State Bar email and November 9, 2022, letter from Spiro (Exhibit C of the FRE 201 Motion at Docket No. 199) confirm that the Defendants have long understood at least the regulatory failures at issue. Their refusal to engage now cannot be attributed to a lack of awareness but instead reflects a deliberate strategy of evasion.

II. DEFENDANTS' FAILURE TO ENGAGE IN PRETRIAL COORDINATION

A. REPEATED NON-COMPLIANCE WITH RULE 26(F) AND LOCAL RULE 16-2.

Pursuant to Federal Rule of Civil Procedure 26(f) and Local Rule 16-2, all parties are required to participate in pretrial coordination discussions to ensure an efficient case management process. Despite multiple good-faith attempts by Plaintiff to initiate such discussions, Defendants have repeatedly failed to meaningfully engage.

The email chain, a complete and accurate copy attached as Exhibit A, consisting of Defendants' communications from February 6–8, 2025, demonstrates their pattern of non-engagement, bad faith, and misrepresentation of procedural obligations.

Plaintiff first requested case management coordination on February 6, 2025, providing multiple available dates for discussion. Defendant Spiro, rather than engaging in a professional or procedural discussion, responded with open hostility and dismissive rhetoric, including but not limited to:

i. Calling Plaintiff's requests "ill-informed nonsense" (Email from Spiro, February 7, 2025)

ii. Accusing Plaintiff of harassment rather than addressing the pretrial coordination obligations (Email from Spiro, February 7, 2025)

iii. Completely refusing to engage in meaningful procedural discussions until judicial intervention appeared imminent, Spiro submits a **premature CMS** (Docket 208), clearly a reaction to Plaintiff's impending Notice of Non-Engagement.

iv. Defendant Spiro claims in the CMS to have completed his good faith obligation to "meet and confer" via email in his official court filing.

B. SPIRO'S EARLY CASE MANAGEMENT STATEMENT (CMS) IS A TRANSPARENT ATTEMPT TO REWRITE HIS PROCEDURAL HISTORY AND FEIGN COMPLIANCE.

On Saturday, February 8, 2025, Defendant Ira Spiro submitted a Case Management Statement (Docket 208) in an obvious reaction to Plaintiff's forthcoming Notice of Non-Engagement. Prior to this filing, Defendant Spiro:

i. Repeatedly refused to engage in pretrial coordination despite multiple outreach efforts

ii. Sent aggressive, unprofessional emails instead of engaging in case management discussions

iii. Acted only after realizing that his obstructionist tactics would be formally documented in court

The CMS does not reflect genuine participation in pretrial coordination but is instead a reactionary attempt to appear compliant before judicial enforcement becomes inevitable. Spiro's last-minute filing does not cure weeks of obstruction, nor does it resolve his failure to engage meaningfully.

Defendant Spiro's CMS is procedurally irrelevant to his Rule 26(f) obligations. Filing a CMS does not fulfill or excuse his failure to participate in direct case management coordination, as required by Rule 26(f) and Local Rule 16-2. Spiro's CMS is an attempt to manufacture compliance where none exists, and it should not be treated by the Court as anything more than a reactionary procedural maneuver designed to avoid accountability.

C. DEFENDANT SPIRO'S PREMATURE CMS FILING IS A TRANSPARENT ATTEMPT TO EVADE DOCUMENTATION OF HIS NONCOMPLIANCE.

On February 8, 2025, the same date by which Plaintiff requested Defendants to confirm their participation in Rule 26(f) pretrial coordination, Defendant Ira Spiro filed a Case Management Statement (Docket 208)—a filing that was not due until February 20, 2025.

Defendant Spiro had multiple opportunities and several weeks to engage in good-faith case management coordination but chose instead to ignore Plaintiff's requests. His sudden filing of a CMS on February 8, 2025—exactly when his noncompliance was set to be formally documented—is not a sign of proactive engagement, but rather an attempt to retroactively cover up his obstruction. Filing a CMS 12 days before its deadline is not a procedural necessity—it is a litigation tactic designed to mislead the Court into believing Spiro has complied when, in reality, he has done nothing of the sort.

This CMS filing does not erase his prior refusals to participate in case management discussions. Instead, it further proves that Defendant Spiro was fully aware of his pretrial obligations but is deliberately delaying engaging making his filing in an effort to avoid inevitable judicial scrutiny.

D. A CASE MANAGEMENT STATEMENT (CMS) IS NOT A SUBSTITUTE FOR RULE 26(F) COORDINATION GIVEN THE OBLIGATION OF GOOD FAITH ENGAGEMENT.

Plaintiff emphasizes that filing a CMS is distinct from, and does not replace, the obligation to engage in meaningful pretrial coordination under Rule 26(f) and Local Rule 16-2. While Defendant Spiro may now attempt to argue that he has participated in case management efforts, this assertion is demonstrably false based on the following facts:

i. Defendant Spiro ignored multiple pretrial coordination requests from Plaintiff, instead responding with hostile and dismissive remarks rather than engaging in procedural discussions.

ii. Defendant Spiro failed to propose available dates for case management coordination prior to February 8, 2025, despite numerous opportunities to do so.

iii. Rather than participating in direct discussions, he unilaterally filed a CMS nearly two weeks before its deadline, attempting to appear procedurally compliant while still refusing direct coordination.

Plaintiff submits that this CMS should not be accepted as evidence of good-faith participation in case management efforts. A CMS is a filing requirement; it is not a substitute for actual engagement in Rule 26(f) discussions.

E. SPIRO'S PREMATURE FILING CONFIRMS THAT HE ACTED ONLY WHEN FORCED DUE TO PLAINTIFF'S DEADLINE AND NOTICE OF INTENT.

The timing of Defendant Spiro's CMS filing alone is sufficient to establish that his actions were reactionary, not proactive. The sequence of events demonstrates that:

i. Plaintiff set a February 8, 2025, deadline for Defendants to confirm participation in pretrial coordination.

ii. Defendant Spiro did not confirm participation by that deadline.

iii. Instead of responding to case management efforts, Defendant Spiro filed his CMS on February 8—the exact day his noncompliance would have been formally recorded.

This is a textbook example of reactionary litigation behavior—where a party refuses to engage until confronted with the prospect of being documented as an obstructionist. The Court should not view this CMS as voluntary compliance but rather as a last-minute maneuver to obscure Defendant Spiro's well-documented refusal to participate in good-faith pretrial coordination.

F. DEFENDANT SPIRO'S ATTEMPT TO "CURE" HIS NONCOMPLIANCE SHOULD NOT BE REWARDED

Courts have consistently held that belated, reactionary compliance does not excuse prior obstruction. Defendant Spiro should not be permitted to evade accountability simply by filing an early CMS that does not actually satisfy his Rule 26(f) obligations.

If Defendant Spiro were genuinely interested in engaging in pretrial coordination, he would have:

1. Responded substantively to Plaintiff's multiple requests for coordination in a timely manner.

2. Confirmed availability for direct discussions rather than preemptively filing a CMS.

3. Engaged in good-faith efforts to streamline case management rather than delaying until a procedural consequence became imminent.

Plaintiff submits that allowing Defendant Spiro to avoid procedural accountability through this tactic would set a dangerous precedent—one in which a party could refuse pretrial coordination, then file a CMS at the last minute to feign compliance and avoid judicial enforcement.

G. REQUEST FOR JUDICIAL INTERVENTION DESPITE DEFENDANT SPIRO'S CMS FILING BECAUSE IT DOES NOT REFLECT MEANINGFUL COMPLIANCE.

Because Defendant Spiro's CMS does not reflect genuine compliance with Rule 26(f) obligations, Plaintiff respectfully requests that the Court take the following actions:

i. Issue an Order Compelling Full Rule 26(f) Compliance

ii. Direct all Defendants, including Defendant Spiro, to actively participate in a Rule 26(f) conference within 7 days.

iii. Require Defendant Spiro to confirm his availability and engage in direct discussions rather than unilateral court filings.

H. DISREGARD DEFENDANT SPIRO'S CMS AS EVIDENCE OF COMPLIANCE IN RECOGINITION OF ITS USE AS PROCEDURAL TACTIC.

Given that this filing was submitted prematurely in an attempt to avoid documentation of noncompliance, the Court should recognize it as a procedural tactic rather than meaningful engagement.

The filing should not absolve Defendant Spiro from his prior refusals to participate in case management discussions.

I. CONSIDER SANCTIONS IF DEFENDANT SPIRO CONTINUES AVOIDING DIRECT COORDINATION.

If Defendant Spiro continues to engage in bad-faith litigation conduct by delaying or avoiding direct coordination, the Court should consider appropriate procedural sanctions to deter further obstruction.

Plaintiff submits that judicial oversight is now necessary to ensure that Defendants, including Defendant Spiro, comply with their obligations in a timely and meaningful manner.

III. HAIGHT'S AND STATE BAR'S PARALLEL TACTICS FURTHER CONFIRM A DELIBERATE DEFENSE STRATEGY THAT DEMONSTRATES THE NEED FOR JUDICIAL INTERVENTION.

While Defendant Spiro has been openly obstructionist, other defense parties, including those represented by Haight Brown & Bonesteel LLP, have at times instigated or mirrored similar conduct. Haight Brown & Bonesteel LLP's actions reflect a **calculated attempt to avoid meaningful engagement while maintaining procedural cover:**

1. **January 15, 2025:** Haight refuses to stipulate to any facts in the November 9, 2022, Spiro letter, despite its obvious relevance.
2. **January 16, 2025:** Haight refuses any further discussions until a ruling on motions to dismiss—despite the **clear obligation to engage in case management coordination regardless of pending motions and a subsequent order issued on February 6, 2025 (See Docket 205).**
3. **February 7, 2025:** Haight informs Plaintiff that it will file a **separate CMS**, mirroring Spiro's obstruction.

A. HAIGHT'S APPARENT DISTANCING FROM SPIRO

Defendant Spiro's most recent email omitted Haight's attorneys, suggesting an internal fracture in the defense strategy (February 8, 2025).

The defense is now openly fractured, further justifying the need for judicial oversight. Defendant Spiro has engaged in overt procedural obstruction, while Haight Brown & Bonesteel LLP

has begun shifting its strategy in response to increasing judicial scrutiny. If Haight files a separate CMS that diverges from Spiro's approach, it will confirm that the defense has no unified position on case management coordination—a clear sign that some defendants recognize the need for compliance while others continue to obstruct. This internal inconsistency alone justifies Court intervention to prevent further litigation gamesmanship.

If Haight engages in limited case management coordination while Spiro continues resisting, this further justifies court intervention, as it indicates a fractured defense strategy rather than a unified litigation position.

B. THE STATE BAR'S SILENCE AND REFUSAL TO ENGAGE CONFIRMS A COORDINATED STRATEGY

The State Bar's continued failure to engage in pretrial coordination, as evidenced in the true and accurate copy of the email chain attached as Exhibit B, is not a mere oversight—it is a calculated effort to avoid addressing the very regulatory failures it has long known existed. The communications exchanged between Plaintiff and the State Bar counsel demonstrate a pattern of evasion, designed to obstruct procedural compliance and delay substantive resolution of the case.

1. **April 29, 2022, Email from the State Bar to PCL (see Exhibit C, Docket No. 199)**

a. The **State Bar knew that PCL was violating credit requirements** yet took no meaningful enforcement action.

b. The email explicitly states that **PCL's credit calculations violated regulatory standards, yet the State Bar allowed the misconduct to continue.**

2. **November 9, 2022, Letter from Spiro (also see Exhibit C, Docket No. 199)**

a. Spiro, as counsel for PCL, openly admitted **non-compliance with credit-hour regulations** but took no corrective action.

b. The letter proves that Spiro and the State Bar were aware of the underlying regulatory failures—yet are now **refusing to engage in case management coordination to avoid addressing these very same issues.**

3. The State Bar's Failure to Respond Confirms a Coordinated Evasion Strategy

The true and accurate email chain (Exhibit B) further confirms that the State Bar has engaged in procedural avoidance.

a. Plaintiff sent multiple requests for a meet and confer under Rule 26(f), all of which were ignored or deflected by the State Bar.

b. On February 10, 2025, the State Bar formally declined to engage, asserting that a meet and confer was "not necessary" despite the clear requirements of Rule 26(f).

c. This refusal is most likely part of a larger effort to avoid addressing the substance of Plaintiff's claims, relying instead on obstructionist tactics to stall litigation.

The State Bar's silence is not accidental—it is a coordinated effort to evade judicial scrutiny and procedural compliance. The attached Exhibit B provides direct evidence that the State Bar has known about these regulatory failures for years but has actively chosen to obstruct resolution.

This continued evasion justifies judicial intervention to compel the State Bar's participation in case management and prevent further delays.

C. IF DEFENDANTS WERE SERIOUS ABOUT COORDINATION, THEY WOULD HAVE ENGAGED EARLIER, EVITATING THE NEED FOR NOTICE.

Plaintiff has made every reasonable effort to coordinate in good faith. If Defendants—particularly Spiro—were genuinely interested in case management discussions, they would not have:

i. Ignored multiple direct emails offering to coordinate

ii. Waited until a Saturday filing to suddenly claim they were willing to engage

iii. Attempted to shift blame onto Plaintiff rather than addressing their own procedural failures

Defendants' belated, inconsistent, and strategically motivated filings suggest they are attempting to reframe their non-compliance only after being confronted with the consequences of continued obstruction.

D. REQUEST FOR JUDICIAL INTERVENTION

Given Defendants' ongoing pattern of evasion, obstruction, and bad-faith litigation tactics, Plaintiff respectfully requests the Court take the following actions:

1. Issue an Order Compelling Full Rule 26(f) Pretrial Coordination

i. Direct all Defendants to confirm availability and engage in meaningful case management discussions within a defined period (e.g., 7 days).

ii. Require Defendant Spiro to formally explain his previous refusal to engage despite clear procedural obligations.

2. Disregard Defendant Spiro's Last-Minute CMS as a Good-Faith Effort

i. Given its timing and context, the CMS (Docket 208) should not be treated as proof of compliance, but rather a reactive filing meant to avoid judicial scrutiny.

ii. Defendant Spiro's past refusals to coordinate should be fully considered when evaluating the legitimacy of his CMS.

3. Consider Sanctions for Continued Bad-Faith Litigation Conduct

i. If Defendant Spiro or any other Defendant continues to refuse meaningful engagement, the Court should consider appropriate procedural sanctions to deter further obstruction.

ii. Sanctions may include monetary penalties, limitations on procedural defenses, or default rulings on case management obligations.

Plaintiff respectfully submits that court intervention is now required to prevent further delay tactics and procedural abuse by Defendants.

Plaintiff notes that the attached email chain (Exhibit A) references *Radovic v. Milosevic,* No. D081145 (Cal. Ct. App. Feb. 23, 2024), a prior case in which Defendant's counsel Haight, and specifically Ms. Jamshidi, was involved. While Plaintiff's primary argument remains focused on the Defendants' noncompliance in this case, the reference to *Radovic* highlights broader concerns about repeated procedural delays and litigation tactics designed to evade substantive engagement, compliance and judicial oversight. Plaintiff does not rely on *Radovic* as a basis for relief here but includes the reference solely as contextual information supporting the necessity of judicial intervention.

IV. DEFENDANTS' NON-ENGAGEMENT DIRECTLY UNDERMINES THE LEGITIMACY OF THEIR RULE 12(B)(6) MOTIONS

Defendants' ongoing refusal to engage in good-faith pretrial coordination while simultaneously insisting in Rule 12(b)(6) motions that Plaintiff's filings are "unintelligible" is both contradictory and revealing. Their actions confirm that their motions are not genuine legal arguments but obstructionist tactics meant to delay the proceedings rather than substantively engage with Plaintiff's claims.

1. Defendants' Failure to Engage Suggests They Are Avoiding Substantive Litigation, Not Addressing a Deficiency in the Complaint
    a. A party that truly believes a claim is "unintelligible" would seek clarification or actively participate in case management discussions to resolve ambiguities.
    b. Here, however, Defendants have done the opposite: they refuse to participate in meaningful case management coordination while simultaneously insisting that Plaintiff's filings are unclear. This contradiction demonstrates that Defendants are not acting in good faith but are instead strategically avoiding substantive engagement.
2. The April 29, 2022, State Bar Email and November 9, 2022, Spiro Letter Disprove Any Claim That Defendants Do Not Understand the Issues in This Case
    a. The State Bar's own internal emails (April 2022) explicitly discuss the same issues that form the foundation of Plaintiff's claims—namely, PCL's regulatory violations and misrepresentations about credit-hour calculations.
    b. Defendant Spiro's November 9, 2022, letter (Exhibit C of the FRE 201 Motion) acknowledges these violations, meaning he has already admitted to knowledge of the regulatory deficiencies at issue.

c. Despite these clear admissions, Defendants now claim that the same allegations are "unintelligible"—a position that is not credible given their own written records confirming the substance of Plaintiff's claims.

3. Defendants' Own Procedural Conduct Demonstrates That Their Rule 12(b)(6) Motions Are a Litigation Tactic, Not a Genuine Legal Argument

a. Defendant Spiro's premature CMS filing (Docket 208) was an attempt to create a false record of compliance after weeks of refusing to engage in case management coordination.

b. Haight and the State Bar's refusal to provide stipulations regarding the Spiro Letter further confirm that they are avoiding accountability, not addressing actual deficiencies in the complaint.

c. If Plaintiff's filings were truly "unintelligible," Defendants would be making every effort to clarify them rather than strategically refusing to engage while awaiting judicial intervention.

V. CONCLUSION: PLAINTIFF REQUESTS IMMEDIATE JUDICIAL INTERVENTION TO PREVENT FURTHER BAD-FAITH TACTICS

Defendants' refusal to engage in substantive case management coordination while simultaneously claiming that Plaintiff's filings are "unintelligible" is a textbook example of bad-faith litigation tactics. If Defendants were truly unable to comprehend the allegations, they would have taken steps to seek clarification rather than obstructing pretrial coordination while relying on vague and conclusory dismissal arguments.

The documentary evidence at issue—including the April 2022 State Bar email and November 2022 Spiro letter—confirms that Defendants were fully aware of the regulatory violations in question and are now willfully avoiding accountability.

Their procedural conduct confirms that their Rule 12(b)(6) motions lack legitimacy and should not be considered as a serious attempt to resolve legal questions.

Plaintiff respectfully requests that the Court:

1. Issue an Order Compelling Full Rule 26(f) Compliance Within Seven (7) Days to prevent further procedural evasion.

2. Reject Defendants' Attempt to Use Rule 12(b)(6) as a Shield Against Substantive Engagement, recognizing their motions as procedural delay tactics.

3. Consider Sanctions if Defendants Continue Avoiding Case Management Coordination in direct violation of the Court's interest in efficient pretrial proceedings.

The Court should not permit Defendants to strategically obstruct pretrial coordination while simultaneously claiming that they cannot understand Plaintiff's filings. Their own internal documents prove otherwise.

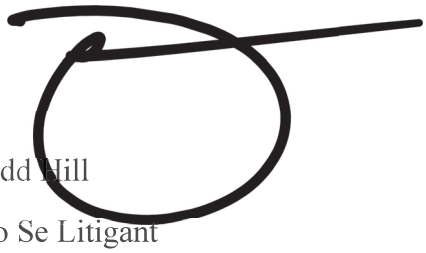
Defendants have demonstrated a clear pattern of non-compliance with Rule 26(f) pretrial coordination obligations. Their last-minute attempts to appear compliant—without actually participating in meaningful discussions—should not be rewarded.

Defendants, particularly Defendant Spiro, have engaged in a clear, documented pattern of procedural obstruction, necessitating judicial intervention. Defendant Spiro has not only refused to engage in Rule 26(f) coordination but has now attempted to manipulate the procedural record with a

"last minute" CMS filing to avoid consequences. This conduct—ignoring obligations, reacting only when forced, and attempting to manufacture procedural cover—demonstrates bad-faith litigation tactics that warrant judicial oversight and possible sanctions.

For these reasons, Plaintiff requests the Court compel Defendants to engage in case management coordination, disregard Defendant Spiro's CMS as an after-the-fact justification for protracted obstruction, and consider sanctions if further evasion occurs.

Dated: February 11, 2025
Respectfully Submitted,



Todd Hill
Pro Se Litigant

STATEMENT OF COMPLIANCE WITH LOCAL RULE 11-6.1

The undersigned party certifies that this brief contains 3,314 words, which complies with the 7,000-word limit of L.R. 11-6.1.

Respectfully submitted,

February 11, 2025
Todd R.G. Hill
Plaintiff, in Propria Persona

PLAINTIFF'S PROOF OF SERVICE

This section confirms that all necessary documents will be properly served pursuant to L.R. 5-3.2.1

Service. This document will be/has been electronically filed. The electronic filing of a document causes a "Notice of Electronic Filing" ("NEF") to be automatically generated by the CM/ECF System and sent by e-mail to: (1) all attorneys who have appeared in the case in this Court and (2) all pro se parties who have been granted leave to file documents electronically in the case pursuant to L.R. 5-4.1.1 or who have appeared in the case and are registered to receive service through the CM/ECF System pursuant to L.R. 5-3.2.2. Unless service is governed by Fed. R. Civ. P. 4 or L.R. 79-5.3, service with this electronic NEF will constitute service pursuant to the Federal Rules of Civil Procedure, and the NEF itself will constitute proof of service for individuals so served.

Respectfully submitted,

February 11, 2025

Todd R.G. Hill

Plaintiff, in Propria Persona

PLAINTIFF'S AFFIDAVIT INCLUDING RELEVANT INFORMATION

I, Todd Hill, being duly sworn, depose and state as follows:

I. INTRODUCTION & PURPOSE

1. I am the Plaintiff in the above-captioned matter, representing myself in propria persona. I submit this affidavit in support of my Notice of Non-Engagement Regarding Case Management Coordination, documenting the Defendants' continued refusal to comply with Rule 26(f) and Local Rule 16-2 requirements.

2. Despite my good-faith efforts to schedule case management coordination, Defendants have deliberately avoided substantive engagement, choosing instead to obstruct, delay, and evade judicial oversight.

3. The email chain, a complete and accurate copy attached as Exhibit A, consisting of Defendants' Haigt and Spiro's communications from February 6–8, 2025, demonstrates their pattern of non-engagement, bad faith, and misrepresentation of procedural obligations.

4. The email chain, a complete and accurate copy attached as Exhibit B, consisting of Defendants' State Bar's communications from February 6–10, 2025, demonstrates their pattern of non-engagement, bad faith, and misrepresentation of procedural obligations.

5. Furthermore, documentary evidence already before this Court, including:

a. The April 29, 2022, State Bar email regarding PCL's regulatory failures, and

b. The November 9, 2022, letter from Defendant Spiro (Exhibit C of the FRE 201 Motion) confirm that Defendants have long known the factual issues at the heart of this case. Their refusal to engage in case management now cannot be attributed to confusion or misunderstanding, but instead reflects an intentional strategy of evasion.

II. EFFORTS TO AVOID UNNECESSARY MOTION PRACTICE

5. In a good-faith effort to comply with procedural requirements and avoid unnecessary motion practice, I initiated a request for meet-and-confer discussions on February 6, 2025.
6. My request explicitly outlined the topics required under Rule 26(f), including:
    a. Jurisdiction and Venue
    b. Factual and Legal Issues
    c. Motions and Pleadings
    d. Discovery Plan
    e. Settlement and ADR
    f. Pretrial and Trial Planning
7. Rather than engaging in any substantive response, Defendants ignored or misrepresented the obligations imposed by Rule 26(f).
8. Defendant Spiro's response on February 7, 2025, falsely claimed that the only issue for discussion was the magistrate judge consent program, an assertion entirely unsupported by law.
9. Defendant Spiro and Haight Brown & Bonesteel LLP (Defendants' counsel) refused to schedule any meetings, failed to propose any alternative dates, and instead chose to file separate Case Management Statements (CMS) rather than engage in coordination.
10. Defendant Spiro "prematurely" (in context to fulfilment of his actual obligations) filed a CMS on February 8, 2025, twelve (12) days before the deadline, only after I set a deadline to confirm participation. This filing serves as a transparent attempt to feign compliance and evade documentation of his refusal to meaningfully engage.

11. In further bad faith, Spiro responded with hostile, accusatory language, falsely claiming I was harassing him, despite the fact that I was merely responding to emails he initiated (See Exhibit A).

12. Haight Brown & Bonesteel LLP coordinated or mirrored Spiro's conduct, refusing to engage in coordination, dismissing my valid requests, and falsely asserting compliance despite their refusal to participate in pretrial discussions.

III. RELEVANCE AND MATERIALITY OF DOCUMENT EXHIBITS

13. Attached as Exhibit A is a true and correct copy of the email chain between myself and Defendants' counsel from February 6–8, 2025.

14. This correspondence reflects Defendants' coordinated refusal to comply with case management obligations, as evidenced by:

a. Defendant Spiro's premature CMS filing (Docket 208) in an attempt to misrepresent compliance.

b. Defendant Kirwin's inaccurate claim that case management obligations only arise 40 days before trial, which is incorrect under Rule 26(f)(1) and Local Rule 16-2.

c. Defendant Davis's dismissal of substantive pretrial issues while refusing to offer any engagement beyond procedural formalities.

15. Additionally, the following documentary evidence—already before this Court—confirms Defendants' longstanding awareness of these issues:

a. The April 29, 2022, State Bar email explicitly acknowledges PCL's credit-hour miscalculations and noncompliance with regulations.

b. The November 9, 2022, letter from Defendant Spiro (Exhibit C of FRE 201 Motion) further confirms that Spiro and the State Bar were aware of these violations, contradicting their present refusal to engage in case management coordination.

16. This evidence directly undermines Defendants' claims that Plaintiff's filings are unintelligible, proving instead that Defendants are actively avoiding meaningful engagement.

IV. JUDICIAL EFFICIENCY & NECESSITY OF INTERVENTION

17. Given Defendants' continued refusal to comply with procedural obligations, I respectfully request the Court to:

a. Issue an Order Compelling Full Rule 26(f) Compliance within seven (7) days.

b. Disregard Defendant Spiro's premature CMS filing (Docket 208) as a procedural tactic rather than good-faith participation.

c. Consider appropriate sanctions for Defendants' continued refusal to participate in case management coordination.

18. Defendants' refusal to engage in substantive case management coordination while simultaneously claiming that Plaintiff's filings are "unintelligible" is a textbook example of bad-faith litigation tactics.

19. The documentary evidence provided, particularly the State Bar's own internal emails and Spiro's prior admissions, proves that Defendants fully understood the issues in this case well

before litigation commenced and are now engaging in obstructionist tactics to avoid accountability.

V. CONCLUSION

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief. Executed on this 10th day of February 2025, in Belton, Texas.

Dated: February 10, 2025
Belton, TX

Respectfully submitted,

February 10, 2025

Todd R.G. Hill

Plaintiff, in Propria Persona

EXHIBIT A

Gmail Todd Hill <toddryangregoryhill@gmail.com>

Todd Hill v. People's College

5 messages

Davis, Yvette <ydavis@hbblaw.com> Fri, Feb 7, 2025 at 3:44 PM
To: Todd Hill <toddryangregoryhill@gmail.com>, "Kirwin, Jeffrey" <jkirwin@hbblaw.com>
Cc: Ira Spiro <ira@spirolawcorp.com>, "Jamshidi, Arezoo" <ajamshidi@hbblaw.com>

Mr. Hill,

The following statement is wholly inaccurate:

"Your collective refusal to engage is troubling, particularly in light of prior litigation where Haight Brown & Bonesteel was involved in procedural noncompliance. Some of the statements in your responses bear a resemblance to issues raised in *Radovic v. Milosevic* (2024), where Haight's client appears to have engaged in nearly identical tactics to avoid pretrial obligations—resulting in court-imposed sanctions."

It was previously addressed by Ms. Jamshidi and your reference to it again is inappropriate.

Again – please include the case name in your subject line. We have requested you do so several times.

Yvette Davis | Profile
Partner
D: 714.426.4607
DF: 714.426.4608
ydavis@hbblaw.com
Haight
Haight Brown & Bonesteel LLP
2030 Main Street
Suite 1525
Irvine, CA 92614
O: 714.426.4600
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From: Todd Hill <toddryangregoryhill@gmail.com>
Sent: Friday, February 7, 2025 12:26 PM
To: Kirwin, Jeffrey <jkirwin@hbblaw.com>
Cc: Ira Spiro <ira@spirolawcorp.com>; Jamshidi, Arezoo <ajamshidi@hbblaw.com>; Davis, Yvette <ydavis@hbblaw.com>
Subject: Re: meeting and conferring

Dear Mr. Kirwin, Ms. Davis, Ms. Jamshidi, and Mr. Spiro,

Your latest responses facially confirm that **Defendants are engaged in a deliberate misrepresentation of procedural obligations to evade compliance with Rule 26(f) and Local Rule 16-2.**

Your responses continue to evade clear procedural requirements under Federal Rule of Civil Procedure 26(f) and Local Rule 16-2—rules designed to prevent exactly the kind of obstructionist tactics currently being employed. The assertion that case management obligations only arise “40 days before trial” has no basis in law or practice. Courts have repeatedly held that pretrial coordination is necessary to streamline litigation, facilitate discovery, and avoid unnecessary delays.

To be clear:

Rule 26(f)(1) requires parties to confer "as soon as practicable" and "at least 21 days before a scheduling conference." There is no requirement that a trial date must be set before these obligations apply.
Local Rule 16-2 mandates meaningful engagement on pretrial matters, including but not limited to:

1. Jurisdiction and Venue
2. Factual and Legal Issues
3. Motions and Pleadings
4. Discovery Plan
5. Settlement and ADR
6. Pretrial and Trial Planning

These are not optional. They are fundamental steps in litigation, and delaying them serves no legitimate purpose.

Your collective refusal to engage is troubling, particularly in light of prior litigation where Haight Brown & Bonesteel was involved in procedural noncompliance. Some of the statements in your responses bear a resemblance to issues raised in *Radovic v. Milosevic* (2024), where Haight’s client appears to have engaged in nearly identical tactics to avoid pretrial obligations—resulting in court-imposed sanctions.

As you are all aware, Courts have shown little tolerance for these delay strategies, and continued refusal to engage in pretrial coordination may invite similar consequences here.

As your position appears to be that you will not engage in pretrial discussions until a trial date is set, I will document this refusal and submit it to the Court. Given the Court’s clear directive regarding case management coordination, this position will be difficult to justify and may result in an order compelling participation.

Otherwise, I expect a substantive response with your availability by 5:00 PM PST on February 8, 2025. If no response is received, I will proceed with my Notice of Non-Engagement and take the appropriate procedural steps.

Respectfully,
Todd

On Fri, Feb 7, 2025 at 12:05 PM Kirwin, Jeffrey <jkirwin@hbblaw.com> wrote:

> Mr. Hill,

The authority you cited requires the conference to be held at least 40 days before the trial date. We have not violated that rule. When is the case management conference?

From: Todd Hill <toddryangregoryhill@gmail.com>
Sent: Friday, February 7, 2025 11:55 AM
To: Kirwin, Jeffrey <jkirwin@hbblaw.com>
Cc: Ira Spiro <ira@spirolawcorp.com>; Jamshidi, Arezoo <ajamshidi@hbblaw.com>; Davis, Yvette <ydavis@hbblaw.com>
Subject: Re: meeting and conferring

Dear Mr. Kirwin, Ms. Davis, Ms. Jamshidi and Mr. Spiro,

Your inquiry regarding a trial date, while creative, appears to suggest that pretrial obligations vanish in the absence of a trial date—a position that would likely surprise both the judiciary and the Federal Rules Committee. **Surely, as experienced counsel under duties of candor, you do not suggest that pretrial obligations disappear absent a trial date?**

As you are aware and has been previously stated, Local Rule 16-2 requires meaningful engagement on pretrial matters, including but not limited to:

1. Jurisdiction and Venue
2. Factual and Legal Issues
3. Motions and Pleadings
4. Discovery Plan
5. Settlement and ADR
6. Pretrial and Trial Planning

I will reiterate that the Court's Order in this matter explicitly mandates compliance with these obligations, consistent with well-established precedent emphasizing the necessity of early pretrial coordination (*Hickman v. Taylor*, 329 U.S. 495 (1947)). Attempts to delay or evade participation do not change the procedural requirements imposed on all parties.

Notably, trial dates are often set during case management conferences, which require substantive input from all parties—an obligation you and your co-counsel are currently declining to fulfill.

If your position is that Defendants refuse to engage in any pretrial discussions until a trial date is set, I will document this refusal accordingly. Given the Court's explicit directive regarding case management coordination, such a position would be difficult to defend and may invite procedural consequences should this matter require judicial intervention.

Otherwise, I expect a substantive response with your availability by 5:00 PM PST on February 8, 2025, so that this matter can proceed in accordance with Court directives. If no response is received, as previously stated, I will proceed with my Notice of Non-Engagement and request for judicial intervention.

Best regards,
Todd

On Fri, Feb 7, 2025 at 11:35 AM Kirwin, Jeffrey <jkirwin@hbblaw.com> wrote:

> Mr. Hill,
>
> What is the trial date for this matter in which you would like to have a pretrial conference for?
>
> Jeffrey Kirwin | Profile
> Attorney
> D: (714) 426-4620

jkirwin@hbblaw.com

Haight

Haight Brown & Bonesteel LLP
2030 Main Street
Suite 1525
Irvine, CA 92614
O: 714.426.4600
F: 714.754.0826
www.hbblaw.com

From: Todd Hill <toddryangregoryhill@gmail.com>
Sent: Friday, February 7, 2025 11:26 AM
To: Ira Spiro <ira@spirolawcorp.com>
Cc: Jamshidi, Arezoo <ajamshidi@hbblaw.com>; Kirwin, Jeffrey <jkirwin@hbblaw.com>; Davis, Yvette <ydavis@hbblaw.com>
Subject: Re: meeting and conferring

Dear Mr. Spiro,

Ms. Davis, Ms. Jamshidi and Mr. Kirwin have been included in this communication due to your inclusion of Ms. Davis, ostensibly as an outreach to effect coordination.

I acknowledge your statement that you will file separately, mirroring the position taken by the other defendants. However, as you are aware, the intent of Rule 26(f) and Local Rule 16-2 is to ensure that parties engage in meaningful pretrial coordination. The decision to bypass full pretrial discussions obstructs judicial efficiency and does not align with established case law, including *Hickman v. Taylor*, which emphasizes the necessity of comprehensive pretrial discussions.

My formal request was for a comprehensive "meet and confer" session at your earliest convenience. As mentioned in the order and stipulated under Local Rule 16-2, parties are encouraged to engage deeply on procedural and substantive matters early in the litigation process to ensure efficiency and fairness in the handling of the case. This rule underscores the likely necessity of our thorough engagement on the topics I have previously outlined and reiterate below. Jurisprudence historically supports this expansive approach to pretrial conferencing; For instance, in *Hickman v. Taylor*, 329 U.S. 495 (1947), the U.S. Supreme Court emphasized the importance of thorough pretrial procedures in clarifying issues and expediting the disposition of cases. The Court noted that proper pretrial preparation helps prevent surprise, narrows the issues, and contributes to the fair and efficient administration of justice. *Hickman* underscores the critical role of early, comprehensive discussions in avoiding protracted litigation and facilitating a fair trial.

Given the complexities of our case and the importance of addressing all pretrial matters thoroughly, I urge all parties to commit to a telephonic or Zoom-based 'meet and confer' that fully complies with our obligations under the Federal and Local Rules.

Should scheduling conflicts arise, I am willing to discuss alternative arrangements to ensure we can meet as soon as possible. For efficiency, and due to the separate nature of representation, I had already reached out to Haight under separate cover.

Respectfully, your assertion that “the only thing the parties are required to meet and confer about is the magistrate judge consent program” is incorrect under Federal Rule of Civil Procedure 26(f) and Local Rule 16-2, which require broader pretrial discussions. Courts have consistently held that pretrial coordination is essential to judicial efficiency and fairness, as mentioned in *Hickman* referenced above.

While I am interested in the reasons for your desired focus on the magistrate judge consent program, I must clarify for the record that the scope of our "meet and confer" under Federal Rule of Civil Procedure 26(f) and Local Rule 16-2 encompasses a broader range of pretrial matters. These discussions are essential not only for judicial efficiency but also for ensuring that we thoroughly prepare for all aspects of case management and potential trial.

As such, I believe it is essential that we engage in a comprehensive dialogue that includes, but is not limited to:

1. Jurisdiction and Venue

2. Factual and Legal Issues
3. Motions and Pleadings
4. Discovery Plan
5. Settlement and ADR
6. Pretrial and Trial Planning

In addition to discussing the magistrate judge consent program, it is crucial that we address all significant pretrial matters as envisioned by Federal Rule of Civil Procedure 26(f) and Local Rule 16-2. These discussions are intended to be robust and encompassing, covering a wide range of issues from jurisdiction and venue to discovery and settlement options. Limiting our conversations to email or restricting them to only the selection of a magistrate judge does not fulfill the spirit or the letter of these procedural mandates.

Given the complexities of our case and the potential for significant legal and factual disputes, I propose an in-person meeting, which will allow us to engage more effectively on these issues.

This approach is not only more conducive to resolving misunderstandings and reaching consensus but also demonstrates to the court our collective commitment to a fair and efficient resolution.

These topics are instrumental in shaping our litigation strategy and ensuring an effective trial management process. Therefore, I propose that we schedule a time for an in-depth discussion on these matters, ideally in a setting that allows for productive engagement.

In relation to the meeting requested with you specifically, I remain available on the following dates and times, and I am open to accommodating other schedules if these do not suit your availability:

Monday, February 10, 2025, from 8 AM to 10 AM PST

Given your refusal to participate in a full meet-and-confer on all necessary pretrial issues, I will be filing a Notice of Non-Engagement with the court no later than February 11, 2025, documenting your position and requesting appropriate judicial intervention.

If you reconsider and wish to engage in a substantive discussion prior to my court filing, I remain available on the dates I previously provided. However, if I do not receive confirmation by **5:00 PM PST on February 8,** I will proceed with my filing.

This correspondence will be included in my filing to demonstrate the defendants' coordinated refusal to engage in necessary pretrial discussions.

Best regards,

Todd R. G. Hill
Pro Se Plaintiff

On Fri, Feb 7, 2025 at 10:56 AM Ira Spiro <ira@spirolawcorp.com> wrote:

> Like the other defendants, per paragraph 12 of the order I will be filing a separate statement.
>
> At this point I do not choose to participate in the magistrate judge consent program, but I might at some later point, though I might not.
>
> *Ira Spiro*
>
> ---
>
> **From:** Ira Spiro
> **Sent:** Friday, February 7, 2025 10:08 AM
> **To:** Todd Hill <toddryangregoryhill@gmail.com>
> **Cc:** Yvette Davis (ydavis@HBBLaw.com) <ydavis@HBBLaw.com>
> **Subject:** meeting and conferring

The only thing that the parties are required to meet and confer about is the magistrate judge consent program and, if we agree to participate in the program, the selection of a judge. That, and meeting and conferring in general, can be done by email.

I will email you my position on the magistrate judge consent program and, if we agree to participate in the program, the selection of a judge.

Ira Spiro, Attorney at Law

TENANTS, PLEASE CALL 310-235-2350

OTHERS, PLEASE CALL 310-287-2007

NO TEXTS!* -- *phones are land lines

Please Correspond by EMAIL ONLY, I do NOT promptly see U.S. Mail, Fed Ex, UPS, etc.

ira@spirolawcorp.com

10573 West Pico Blvd. #865, Los Angeles, CA 90064

website: spirolawcorp.com

pronouns: he

From: Todd Hill <toddryangregoryhill@gmail.com>
Sent: Thursday, February 6, 2025 8:15 PM
To: Ira Spiro <ira@spirolawcorp.com>
Subject:

Dear Mr. Spiro,

Pursuant to Federal Rule of Civil Procedure 26(f) and Local Rule 16-2, I am initiating coordination for a meet and confer regarding the preparation of our Joint Case Management Statement for submission to the Court. As we all appreciate, adhering to these procedural mandates is crucial for an efficient and orderly pretrial process.

Proposed Topics for Discussion:

1. **Jurisdiction and Venue** – We need to confirm whether there is mutual agreement on jurisdiction or if there are anticipated challenges that need addressing.

2. **Factual and Legal Issues** – We must outline and discuss the core disputed and undisputed facts, along with the applicable legal theories. A clear understanding of these elements will guide our legal strategies and help streamline the proceedings.

3. **Motions and Pleadings** – Discussion should include any potential amendments to the pleadings, anticipated dispositive motions, or other pending motions that may affect the course of the case.

4. **Discovery Plan** – We should define the scope of discovery, identify any anticipated disputes, and discuss potential scheduling orders to ensure a streamlined process.

5. **Settlement and ADR** – While exploring settlement options is a standard procedure, it is important to assess the efficiency and effectiveness of engaging in ADR at this stage. We should discuss whether ADR could genuinely expedite a fair resolution or if it might extend the litigation timeline, considering past interactions and the current posture of the case.

6. **Pretrial and Trial Planning** – Determining the estimated length of trial, setting potential trial dates, and discussing any anticipated evidentiary issues will be critical for our preparations.

The efficient resolution of these items is instrumental in shaping our litigation strategy and ensuring effective trial management. I propose we schedule our meet and confer at the earliest mutual convenience, planning for up to two (2) hours to allow reasonable time for discussion. Thus, as proposed below, each session is scheduled from 8 AM to 10 AM PST. I am available on the following:

Monday, February 10, 2025, at 8 AM to 10 AM PST

If this date is not suitable, please provide alternative availability within the next five business days so we can finalize our schedule promptly. Should there be any reluctance to participate in the meet and confer, please be advised that I will inform the court accordingly and will proceed with filing a separate statement of non-engagement detailing the Plaintiff's position.

Please confirm your participation by **Friday, February 7, 2025**, to ensure we comply with the court's procedural requirements. If you have any proposed modifications to the topics or wish to add additional items for discussion, do not hesitate to contact me.

I look forward to your prompt response and to collaboratively working toward an efficient resolution of procedural matters in this case.

Sincerely,

Todd R. G. Hill
Pro Se Plaintiff

Todd Hill <toddryangregoryhill@gmail.com> Fri, Feb 7, 2025 at 4:10 PM
To: "Davis, Yvette" <ydavis@hbblaw.com>, "Kirwin, Jeffrey" <jkirwin@hbblaw.com>, Ira Spiro <ira@spirolawcorp.com>, "Jamshidi, Arezoo" <ajamshidi@hbblaw.com>

Dear Ms. Davis, Mr. Kirwin, Ms. Jamshidi, and Mr. Spiro,

Your response doesn't address the core issue—your obligation under Federal Rule of Civil Procedure 26(f) and Local Rule 16-2 to engage in pretrial coordination.

You state that my reference to *Radovic v. Milosevic* is 'wholly inaccurate,' yet you provide no explanation as to why.

Simply stating that Ms. Jamshidi or Mr. Kirwin, have "already addressed" *Radovic v. Milosevic* without offering any explanation does not constitute a "substantive response". If you contend that *Radovic* is distinguishable from this case, please clarify how, specifically regarding the procedural delays, litigation strategy, and judicial response. Given the facial similarities in litigation tactics, I would appreciate specific distinctions rather than broad assertions.

Beyond that, you still haven't provided any legitimate reason for refusing to participate in pretrial discussions. Your assertion that case management obligations don't arise until "40 days before trial" isn't supported by the law. Courts have routinely rejected this interpretation.

If your position is that you've met your obligations under Rule 26(f) and Local Rule 16-2, please explain:

How your refusal to meet and confer complies with these rules.

Why you believe pretrial coordination isn't necessary at this stage.

How your position on *Radovic* is legally or factually different from the present case, specifically as it pertains to counsel or the defendant's conduct and the ultimate outcome.

I reiterate, if I don't receive a substantive response by 5:00 PM PST on February 8, 2025, I will proceed with filing my Notice of Non-Engagement on February 11, 2025, with the full email chain included to document Defendants' refusal to participate.

Finally, regarding your request to include the case name in the subject line, I would note that Mr. Spiro initiated this email chain, not me. If this is an issue, I suggest directing that request to him. More importantly, I would appreciate a substantive response to the issues raised above, rather than a focus on procedural formatting.

Best,
Todd
[Quoted text hidden]

Ira Spiro <ira@spirolawcorp.com> Fri, Feb 7, 2025 at 6:16 PM
To: Todd Hill <toddryangregoryhill@gmail.com>
Cc: "Davis, Yvette" <ydavis@hbblaw.com>, "Kirwin, Jeffrey" <jkirwin@hbblaw.com>, "Jamshidi, Arezoo" <ajamshidi@hbblaw.com>

Todd Hill, your emails below, and the rest of them today and this week, are more of your ill-informed nonsense.

Please stop harassing me and wasting my time with your preposterous emails.

You sued once for a civil harassment restraining order, which the court rejected in short order and had to tell you to stop arguing with him because he had decided. Do I have to sue you for a restraining order to get you to stop?

Ira Spiro

[Quoted text hidden]

Todd Hill <toddryangregoryhill@gmail.com> Fri, Feb 7, 2025 at 6:26 PM
To: Ira Spiro <ira@spirolawcorp.com>
Cc: "Davis, Yvette" <ydavis@hbblaw.com>, "Kirwin, Jeffrey" <jkirwin@hbblaw.com>, "Jamshidi, Arezoo" <ajamshidi@hbblaw.com>

Mr. Spiro,

I have only been responding to emails on a chain that you initiated. If you no longer wish to engage in this discussion, you are free to stop responding. However, I will continue pursuing compliance with Rule 26(f) and Local Rule 16-2 through the appropriate procedural channels.

Sincerely,

Todd

[Quoted text hidden]

Ira Spiro <ira@spirolawcorp.com> Sat, Feb 8, 2025 at 9:42 AM
To: Todd Hill <toddryangregoryhill@gmail.com>

You're wrong again, Hill, and about such a simple thing – look at the very bottom of the email chain

[Quoted text hidden]

EXHIBIT B

Gmail

Todd Hill <toddryangregoryhill@gmail.com>

Hill v. Peoples College of Law, et al. – Case No. 2:23-CV-01298-CV-BFM Request for Meet and Confer Regarding Joint Case Management Statement

4 messages

Todd Hill <toddryangregoryhill@gmail.com> Thu, Feb 6, 2025 at 11:50 AM
To: "Krasilnikoff, Jean" <Jean.Krasilnikoff@calbar.ca.gov>, "Ko, Jennifer" <Jennifer.Ko@calbar.ca.gov>, "Sullivan, Ryan" <ryan.sullivan@calbar.ca.gov>
Cc: "Batdorj, Jenny" <jenny.batdorj@calbar.ca.gov>

Dear Ms. Krasilnikoff, Ms. Ko, and Mr. Sullivan,

Pursuant to Federal Rule of Civil Procedure 26(f) and Local Rule 16-2, I am initiating coordination for a meet and confer regarding the preparation of our Joint Case Management Statement for submission to the Court. As we all appreciate, adhering to these procedural mandates is crucial for an efficient and orderly pretrial process.

Proposed Topics for Discussion:

1. **Jurisdiction and Venue –** We need to confirm whether there is mutual agreement on jurisdiction or if there are anticipated challenges that need addressing.
2. **Factual and Legal Issues –** We must outline and discuss the core disputed and undisputed facts, along with the applicable legal theories. A clear understanding of these elements will guide our legal strategies and help streamline the proceedings.
3. **Motions and Pleadings –** Discussion should include any potential amendments to the pleadings, anticipated dispositive motions, or other pending motions that may affect the course of the case.
4. **Discovery Plan –** We should define the scope of discovery, identify any anticipated disputes, and discuss potential scheduling orders to ensure a streamlined process.
5. **Settlement and ADR –** While exploring settlement options is a standard procedure, it is important to assess the efficiency and effectiveness of engaging in ADR at this stage. We should discuss whether ADR could genuinely expedite a fair resolution or if it might extend the litigation timeline, considering past interactions and the current posture of the case.
6. **Pretrial and Trial Planning –** Determining the estimated length of trial, setting potential trial dates, and discussing any anticipated evidentiary issues will be critical for our preparations.

The efficient resolution of these items is instrumental in shaping our litigation strategy and ensuring effective trial management. I propose we schedule our meet and confer at the earliest mutual convenience, planning for up to two (2) hours to allow reasonable time for discussion. Thus, as proposed below, each session is scheduled from 9 AM to 11 AM PST. I am available on the following dates and times:

Tuesday, February 11, 2025, at 9 AM to 11 AM PST

Wednesday, February 12, 2025, at 9 AM to 11 AM PST

Thursday, February 13, 2025, at 9 AM to 11 AM PST

If these dates are not suitable, please provide alternative availability within the next five business days so we can finalize our schedule promptly. Should there be any reluctance to participate in the meet and confer, please be advised that I will inform the court accordingly and will proceed with filing a separate statement detailing the Plaintiff's position.

Please confirm your participation by **Friday, February 7, 2025**, to ensure we comply with the court's procedural requirements. If you have any proposed modifications to the topics or wish to add additional items for discussion, do not hesitate to contact me.

I look forward to your prompt response and to collaboratively working toward an efficient resolution of procedural matters in this case.

Sincerely,

Todd R. G. Hill
Pro Se Plaintiff

Todd Hill <toddryangregoryhill@gmail.com> Fri, Feb 7, 2025 at 7:58 PM
To: "Krasilnikoff, Jean" <Jean.Krasilnikoff@calbar.ca.gov>, "Ko, Jennifer" <Jennifer.Ko@calbar.ca.gov>, "Sullivan, Ryan" <ryan.sullivan@calbar.ca.gov>
Cc: "Batdorj, Jenny" <jenny.batdorj@calbar.ca.gov>

Dear Ms. Krasilnikoff, Ms. Ko, and Mr. Sullivan,

I am following up on my February 6, 2025, email requesting coordination for our Rule 26(f) conference, as required under the Federal Rules of Civil Procedure and Local Rule 16-2. As of today, I have not received confirmation of your availability for any of the proposed dates.

To ensure compliance with our pretrial obligations, please confirm your participation no later than close of business on Monday, February 10, 2025. If I do not receive a response by that time, I will proceed with filing a Notice of Non-Engagement with the Court on February 11, 2025.

If you are available on different dates, please propose alternative times by 5:00 PM PST on February 10, 2025, so that we may coordinate accordingly. Otherwise, I will assume that Defendants do not intend to participate and will notify the Court accordingly.

Sincerely,

Todd

[Quoted text hidden]

Ko, Jennifer <Jennifer.Ko@calbar.ca.gov> Mon, Feb 10, 2025 at 9:47 AM
To: Todd Hill <toddryangregoryhill@gmail.com>
Cc: "Batdorj, Jenny" <Jenny.Batdorj@calbar.ca.gov>, "Sullivan, Ryan" <Ryan.Sullivan@calbar.ca.gov>, "Krasilnikoff, Jean" <Jean.Krasilnikoff@calbar.ca.gov>

Mr. Hill:

Per the Court's reassignment order, the Court has ordered the parties to file a case management statement. The court's order does not order the parties to conduct a Rule 26(f) conference.

Indeed, the reassignment order specifically states that the parties may file separate case management statements where, as here, any party is proceeding pro se. *See* Dkt. 205 at 3 ("The parties shall file a Joint Case Management Statement within fourteen (14) days of the date of this Order. Separate statements are appropriate if any party is proceeding without counsel.").

Accordingly, there is no need for us to meet and confer prior to filing our separate statements.

Thank you.

Jen Ko (she/her/hers)

Assistant General Counsel, Office of General Counsel

The State Bar of California | 845 South Figueroa Street | Los Angeles, CA 90017

213-765-1269 | jennifer.ko@calbar.ca.gov

OUR VALUES | Clarity • Investing in Our People • Excellence • Respect • Growth Mindset

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Working to protect the public in support of the mission of the State Bar of California.

Please consider the environment before printing this email.

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From: Todd Hill <toddryangregoryhill@gmail.com>
Sent: Friday, February 7, 2025 7:59 PM
To: Krasilnikoff, Jean <Jean.Krasilnikoff@calbar.ca.gov>; Ko, Jennifer <Jennifer.Ko@calbar.ca.gov>; Sullivan, Ryan <Ryan.Sullivan@calbar.ca.gov>
Cc: Batdorj, Jenny <Jenny.Batdorj@calbar.ca.gov>
Subject: Re: Hill v. Peoples College of Law, et al. – Case No. 2:23-CV-01298-CV-BFM Request for Meet and Confer Regarding Joint Case Management Statement

[Quoted text hidden]

2025.02.06_Dkt. 205_Reassignment Order.pdf
33K

Todd Hill <toddryangregoryhill@gmail.com> Mon, Feb 10, 2025 at 10:43 AM
To: "Ko, Jennifer" <Jennifer.Ko@calbar.ca.gov>
Cc: "Batdorj, Jenny" <Jenny.Batdorj@calbar.ca.gov>, "Sullivan, Ryan" <Ryan.Sullivan@calbar.ca.gov>, "Krasilnikoff, Jean" <Jean.Krasilnikoff@calbar.ca.gov>

Dear Ms. Ko, Ms. Krasilnikoff and Mr. Ryan,

I write to clarify that the Court's reassignment order does not eliminate Defendants' Rule 26(f) obligations. Your assertion that no meet-and-confer is required is incorrect, as Rule 26(f) remains a mandatory pretrial requirement under the Federal Rules of Civil Procedure and Local Rule 16-2(a). Accordingly, Defendants' refusal to engage does not align with either procedural obligations or professional responsibilities under duties of candor and good faith.

A. The Court's Order Does Not Supersede Rule 26(f) Obligations

1. The requirement to engage in Rule 26(f) coordination exists independently of the reassignment order and remains a mandatory pretrial obligation.
2. Local Rule 16-2(a) states that "counsel for the parties must confer regarding case management issues as required by Federal Rule of Civil Procedure 26(f)."
3. Rule 26(f)(1) expressly mandates that the parties must confer "as soon as practicable" to develop a discovery plan and discuss pretrial issues. The fact that separate statements are permitted under the reassignment order does not negate this obligation.

B. The Court's Order Does Not Relieve Defendants of Their Duty to Engage in Pretrial Coordination

1. The Court's directive to submit a CMS does not conflict with, nor does it override, the obligation to meaningfully confer on case management issues prior to submission.
2. The purpose of Rule 26(f) is to ensure that case management statements are meaningful, not unilaterally drafted in procedural isolation.
3. Simply filing separate statements without engaging in substantive discussions is a procedural evasion, not compliance with federal rules.

C. Defendants' Refusal to Confer Reinforces a Pattern of Avoidance and Procedural Obstruction

Defendants' refusal to engage is not merely an oversight—it is part of a deliberate pattern of avoidance that contradicts both their legal arguments and their own internal records. The April 29, 2022, State Bar email and November 9, 2022, Spiro letter (Exhibit C of the FRE 201 Motion, Docket 199) confirm that Defendants have long understood these regulatory failures yet are now refusing to engage in pretrial coordination to avoid addressing them substantively.

This directly undercuts Defendants' assertions in their Rule 12(b)(6) motions that Plaintiff's filings are "unintelligible." If Defendants understood the issues well enough to internally document them in 2022, then their refusal to engage now is not a matter of procedural necessity but of strategic evasion.

It is therefore not credible for Defendants to suggest that there is no need to engage in pretrial coordination when these same issues form the basis of Defendants' Rule 12(b)(6) arguments and prior pleadings.

Given Defendants' continued refusal to comply with Rule 26(f), I will proceed with filing a **Notice of Non-Engagement** documenting their **deliberate non-compliance** with pretrial coordination requirements.

Should the Court find that Defendants are acting in **bad faith** by obstructing case management procedures, I will request that appropriate **procedural orders be issued** compelling engagement and, if necessary, that the Court consider further remedies for Defendants' failure to comply with fundamental pretrial obligations.

Sincerely,

Todd

[Quoted text hidden]

TODD R. G. HILL
119 Vine St.
Belton, TX 76513
+1 (661) 899-8899
Email: toddryangregoryhill@gmail.com
IN PRO PER

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION

TODD R. G. HILL, individually, and as attorney-in-fact, guardian ad liem to ROES 1-8,

Plaintiff,

v.

THE BOARD OF DIRECTORS, OFFICERS AND AGENTS AND INDIVIDUALS OF THE PEOPLES OF THE COLLEGE OF LAW;

Defendants.

The Hon. Cynthia Valenzuela
Courtroom 5D, 5th Floor

Magistrate Judge Brianna Fuller Mircheff
Courtroom 780, 7th Floor

Case No. 2:23-cv-01298-CV-BFM

[PROPOSED] ORDER COMPELLING DEFENDANTS TO ENGAGE IN RULE 26(F) CASE MANAGEMENT COORDINATION

BACKGROUND

Before the Court is Plaintiff's Notice of Non-Engagement Regarding Case Management Coordination filed on February 10, 2025. Plaintiff asserts that Defendants State Bar of California, Haight Brown & Bonesteel LLP, and Ira Spiro have failed to comply with their obligations under Federal Rule of Civil Procedure 26(f) and Local Rule 16-2, despite multiple requests from Plaintiff to coordinate a case management conference.

The Court has reviewed the filings and supporting evidence, including Exhibit A and Exhibit B, which provide a true and accurate copy of the correspondence between Plaintiff and Defendants demonstrating a pattern of non-engagement.

The Court finds that:

1. Defendants have failed to participate in case management coordination in violation of Rule 26(f) and Local Rule 16-2.

2. Defendants were properly notified of their obligations and provided multiple opportunities to schedule case management discussions but refused or failed to engage.
3. Continued refusal to engage in case management coordination will result in further delay and may warrant sanctions.

Accordingly, IT IS HEREBY ORDERED:

ORDER

1. Defendants shall participate in a Rule 26(f) case management conference with Plaintiff no later than February 20, 2025:

The parties shall meet and confer in good faith regarding case management scheduling, discovery timelines, and other pretrial matters.

2. Defendants shall file a Joint Case Management Statement or separate statements (if necessary) by February 23, 2025:

If Defendants refuse to participate, Plaintiff may file a declaration of non-compliance, and the Court will consider appropriate sanctions.

3. Failure to comply with this Order may result in monetary sanctions, preclusion of defenses, or other appropriate relief.

The Court reserves the right to impose additional sanctions under Rule 16(f) if Defendants continue to obstruct case management coordination.

IT IS SO ORDERED.

DATED: _____, 2025

Dated: February ___, 2025 By:_____

Hon. Cynthia Valenzuela
Judge of the United States District Court
Central District of California